

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CITY OF BIRMINGHAM RETIREMENT AND
RELIEF SYSTEM; ELECTRICAL WORKERS
PENSION FUND LOCAL 103, I.B.E.W.; and
LOCAL 103, I.B.E.W. HEALTH BENEFIT PLAN,
individually and on behalf of all others similarly
situated,

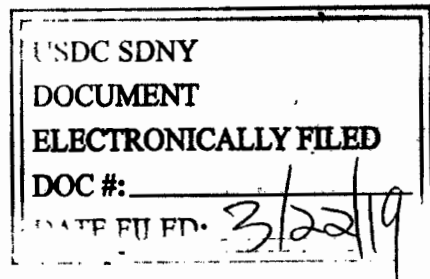
Plaintiffs,

v.

BANK OF AMERICA, N.A.; BARCLAYS BANK
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS
SECURITIES CORP.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE AG; CREDIT
SUISSE SECURITIES (USA) LLC; DEUTSCHE
BANK AG; DEUTSCHE BANK SECURITIES INC.;
FIRST TENNESSEE BANK, N.A.; FTN
FINANCIAL SECURITIES CORP.; GOLDMAN
SACHS & CO. LLC; JPMORGAN CHASE BANK,
N.A.; JPMORGAN SECURITIES LLC; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC; AND
UBS SECURITIES LLC,

Defendants.

Civil Action No.: 1:19-cv-01704-JSR



-----X
ALASKA ELECTRICAL PENSION FUND,
on behalf of itself and all others similarly situated,

Plaintiff,

v.

BANK OF AMERICA, N.A., MERRILL LYNCH,
PIERCE, FENNER & SMITH INC., BARCLAYS
CAPITAL INC., BNP PARIBAS SECURITIES
CORP., CITIGROUP GLOBAL MARKETS INC.,
DEUTSCHE BANK SECURITIES INC., HSBC
SECURITIES (USA) INC., HSBC BANK PLC, J.P.
MORGAN CHASE BANK, N.A.; J.P. MORGAN
SECURITIES LLC, J.P. MORGAN CHASE BANK,
N.A., NOMURA SECURITIES INTERNATIONAL,

Civil Action No.: 1:19-cv-01796-JSR

INC., TD SECURITIES (USA) LLC, and WELLS
FARGO SECURITIES, LLC,

Defendants.

-----X
DEERFIELD BEACH MUNICIPAL
FIREFIGHTERS' PENSION TRUST FUND,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.; BARCLAYS BANK
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS
SECURITIES CORP.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE AG; CREDIT
SUISSE SECURITIES (USA) LLC; DEUTSCHE
BANK AG; DEUTSCHE BANK SECURITIES INC.;
FIRST TENNESSEE BANK, N.A.; FTN
FINANCIAL SECURITIES CORP.; GOLDMAN
SACHS & CO. LLC; JPMORGAN CHASE BANK,
N.A.; JPMORGAN SECURITIES LLC; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC; AND
UBS SECURITIES LLC,

Defendants.

-----X
LINCOLNSHIRE POLICE PENSION FUND,
individually and on behalf of all others similarly
situated,

Plaintiff,

v.

BANK OF AMERICA, N.A.; BARCLAYS BANK
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS
SECURITIES CORP.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE AG; CREDIT
SUISSE SECURITIES (USA) LLC; DEUTSCHE
BANK AG; DEUTSCHE BANK SECURITIES INC.;
FIRST TENNESSEE BANK, N.A.; FTN

Civil Action No.: 1:19-cv-1900-JSR

Civil Action No.: 1:19-cv-2045-JSR

FINANCIAL SECURITIES CORP.; GOLDMAN
SACHS & CO. LLC; JPMORGAN CHASE BANK,
N.A.; JPMORGAN SECURITIES LLC; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC.; AND
UBS SECURITIES LLC,

Defendants.

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JOSEPH M. TORSELLA, IN HIS OFFICIAL
CAPACITY AS TREASURER OF THE
COMMONWEALTH OF PENNSYLVANIA,
individually and on behalf of all others similarly
situated,

Plaintiff,

- against -

BANK OF AMERICA, N.A.; BARCLAYS BANK
PLC; BARCLAYS CAPITAL INC.; BNP PARIBAS
SECURITIES CORP.; CITIGROUP GLOBAL
MARKETS INC.; CREDIT SUISSE AG; CREDIT
SUISSE SECURITIES (USA) LLC; DEUTSCHE
BANK AG; DEUTSCHE BANK SECURITIES INC.;
FIRST TENNESSEE BANK, N.A.; FTN
FINANCIAL SECURITIES CORP.; GOLDMAN
SACHS & CO. LLC; JPMORGAN CHASE BANK,
N.A.; J.P. MORGAN SECURITIES LLC; MERRILL
LYNCH, PIERCE, FENNER & SMITH INC.; AND
UBS SECURITIES LLC,

Defendants.

-----X

Civil Action No.: 1:19-cv-02438-JSR

**STIPULATION AND [PROPOSED] ORDER REGARDING SERVICE AND
TIME FOR DEFENDANTS TO ANSWER, MOVE OR OTHERWISE
RESPOND TO THE COMPLAINTS**

WHEREAS, on February 22, 2019, plaintiffs City of Birmingham Retirement and
Relief System, Electrical Workers Pension Fund Local 103, I.B.E.W, and Local 103, I.B.E.W.

Health Benefit Plan (“City of Birmingham”) filed a complaint in Case No. 1:19-cv-01704 in this Court (“City of Birmingham action”);

WHEREAS, on February 26, 2019, plaintiff Alaska Electrical Pension Fund (“Alaska Electrical”) filed a complaint in Case No. 1:19-cv-01796 in this Court (“Alaska Electrical action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on February 28, 2019, plaintiff Deerfield Beach Municipal Firefighters’ Pension Trust Fund (“Deerfield Beach”) filed a complaint in Case No. 1:19-cv-01900 in this Court (“Deerfield Beach action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on March 5, 2019, plaintiff Lincolnshire Police Pension Fund (“Lincolnshire Police” and, together with City of Birmingham, Alaska Electrical, and Deerfield Beach, “Plaintiffs”) filed a complaint in Case No. 1:19-cv-2045 in this Court (“Lincolnshire Police action”) and marked the action as related to the City of Birmingham action;

WHEREAS, on March 19, 2019, plaintiff Joseph M. Torsella, in his Official Capacity as Treasurer of the Commonwealth of Pennsylvania (“Torsella” and, together with City of Birmingham, Alaska Electrical, Deerfield Beach, and Lincolnshire Police, “Plaintiffs”) filed a complaint in Case No. 1:19-cv-02438 in this Court (“Torsella action”) and marked the action as related to the City of Birmingham action;

WHEREAS, the City of Birmingham action, the Alaska Pension Fund action, the Deerfield Beach action, the Lincolnshire Police action, and the Torsella action are collectively referred to herein as the “Related Actions”;

WHEREAS, the following parties (“Defendants”) are named as defendants in one or more of the Related Actions: Bank of America, N.A., Barclays Bank PLC, Barclays Capital

Inc., BNP Paribas Securities Corp., Citigroup Global Markets Inc., Credit Suisse AG, Credit Suisse (USA) LLC, Deutsche Bank AG, Deutsche Bank Securities Inc., HSBC Securities (USA) Inc., HSBC Bank PLC, First Tennessee Bank, N.A., FTN Financial Securities Corp., Goldman Sachs & Co. LLC, JPMorgan Chase Bank, J.P. Morgan Securities LLC, Merrill Lynch, Pierce, Fenner & Smith Inc., Nomura Securities International, Inc., TD Securities (USA) LLC, UBS Securities LLC, and Wells Fargo Securities, LLC;

WHEREAS, certain Plaintiffs in the Related Actions have attempted to effectuate service of their complaint on certain Defendants, but not others;

WHEREAS, the Related Actions involve common questions of law and fact, make substantially similar factual allegations and assert the same claims, and the undersigned parties agree, subject to approval of the Court, that the Related Actions should be consolidated for all purposes under Federal Rule of Civil Procedure 42(a);

WHEREAS, on March 18, 2019, the Court scheduled an initial conference on April 3, 2019 at 11:00 AM for the purpose of case management pursuant to Fed. R. Civ. P. 16, and ordered the parties to submit a proposed case management plan by March 27, 2019;

WHEREAS, there has been no prior request to extend any deadlines in the Related Actions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, subject to approval of the Court, that:

1. The undersigned counsel accept service of the complaints in the Related Actions on behalf of their respective clients, expressly reserving the right to contest whether any party is properly named as a defendant, and without waiver of any defenses, including without limitation

those related to personal jurisdiction and venue, except as to the sufficiency of process and the service of process.

2. All Defendants' time to answer, move or otherwise respond to the complaints filed in the Related Actions is hereby suspended until an order is entered by the Court at or after the April 3 initial conference at which the parties anticipate addressing with the Court, among other things, a schedule for: (i) the consolidation of the Related Actions; (ii) the appointment of interim lead counsel under Federal Rule of Civil Procedure 23(g); (iii) the filing of the Consolidated Amended Complaint; and (iv) a briefing schedule for motions to dismiss the Consolidated Amended Complaint.

Dated: March 21, 2019
New York, New York

Respectfully submitted,



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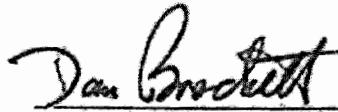
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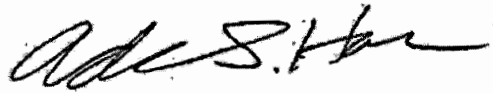
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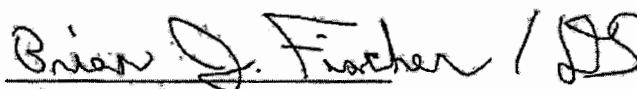
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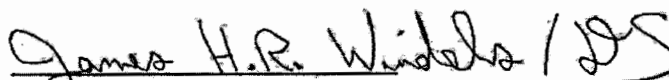
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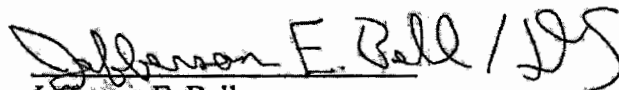
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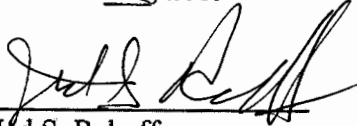
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SO ORDERED.

Dated: New York, New York

March 22, 2019

A handwritten signature in black ink, appearing to read "Jed S. Rakoff", written over a horizontal line.

Hon. Jed S. Rakoff